

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

CONSTANCE DENSON, et al.	)	CASE NO.
	)	
on behalf of themselves and all others	)	JUDGE
similarly situated,	)	
	)	MAGISTRATE JUDGE
Plaintiffs,	)	
	)	<u>AFFIDAVIT OF CONSENT OF</u>
vs.	)	<u>CONSTANCE DENSON TO BE A</u>
	)	<u>REPRESENTATIVE PLAINTIFF</u>
GREAT LAKES CHEESE CO., INC., et al.	)	<u>FOR A CLASS OF SIMILARLY-</u>
	)	<u>SITUATED OPT-IN PLAINTIFFS</u>
Defendants.	)	

To: Clerk of Court  
United States District Court  
Northern District of Ohio

I, Constance Denson, hereby swear, under penalty of perjury, that the following is true and correct to the best of my personal knowledge, information, and belief:

1. I am over 18 years of age and competent to make the following representations and give the following consent in this matter.

2. I was employed by Defendants Great Lakes Cheese Co., Inc. and Great Lakes Cheese of Ohio (collectively "Great Lakes Cheese") between approximately April, 2004 and April, 2006 as a line attendant.

3. I seek to recover unpaid wages from Defendants Great Lakes Cheese under the Fair Labor Standards Act and Ohio Minimum Wage Act, and consent to be the named Plaintiff in the above-captioned collective action. I agree to be bound by any adjudication of this action by the Court, and any collective action settlement approved by my attorneys and this Court as being fair, adequate and reasonable.

4. I consent to bring this action on behalf of myself and two classes of similarly-situated opt-in plaintiffs, as defined in the above-captioned Complaint as follows:

**The Rounding Class**

All former and current production employees of Defendants Great Lakes Cheese in Hiram, Ohio, who at any time between July 2, 2004 and present, were not paid for all hours worked due to Defendants' practice of rounding down start times to the nearest half of an hour.

**The Uniform Class**

All former and current production employees of Defendants Great Lakes Cheese in Hiram, Ohio, who at any time between July 2, 2004 and present, were not paid for changing into and out of uniforms, hair coverings, and/or personal protective equipment at work.

5. I observed that these classes of similarly-situated opt-in plaintiffs consist of no less than two hundred persons. At any given time during my employment, Defendants employed at least two hundred production employees.

6. I believe that I am similarly situated to the rounding class of opt-in plaintiffs because, during my employment at Great Lakes Cheese, I observed that the class and I:


- (a) were non-exempt, hourly, production employees; and
- (b) were not paid for all of the time we actually worked because our start times were rounded down to the nearest half of an hour.

7. I believe that I am similarly situated to the uniform class of opt-in plaintiffs because, during my employment at Great Lakes Cheese, I observed that the class and I:


- (a) were non-exempt, hourly, production employees; and
- (b) were not paid for time spent changing into and out of our uniforms, hair coverings, and personal protective equipment at work.

WHEREFORE, I hereby consent and agree to be a representative Plaintiff in the above-captioned collective action against Defendants Great Lakes Cheese, and to be represented by Cohen Rosenthal & Kramer LLP and The Lazzaro Law Firm, LLC.

FURTHER AFFIANT SAYETH NAUGHT.

  
Constance Denson  
3426 Dunstan Drive, NW, Apt. 1  
Warren, OH 44485

SWORN TO BEFORE ME and subscribed in my presence in Trumbull County, Ohio, this 29th day of June, 2007.

  
\_\_\_\_\_  
Notary Public



ANTHONY J. LAZZARO, Attorney  
Notary Public, State of Ohio  
My Commission Has No  
Expiration Date  
Section 147.03 R.C.

Respectfully submitted,

**COHEN ROSENTHAL & KRAMER LLP**

/s/ Jason R. Bristol  
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*Attorneys for Plaintiff*

**THE LAZZARO LAW FIRM, LLC**

/s/ Anthony J. Lazzaro  
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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

CONSTANCE DENSON, et al.	)	CASE NO.
	)	
on behalf of themselves and all others	)	JUDGE
similarly situated,	)	
	)	MAGISTRATE JUDGE
Plaintiffs,	)	
	)	<u>AFFIDAVIT OF CONSENT OF</u>
vs.	)	<u>LAURA STEERMAN TO BE A</u>
	)	<u>REPRESENTATIVE PLAINTIFF</u>
GREAT LAKES CHEESE CO., INC., et al.	)	<u>FOR A CLASS OF SIMILARLY-</u>
	)	<u>SITUATED OPT-IN PLAINTIFFS</u>
Defendants.	)	

To: Clerk of Court  
United States District Court  
Northern District of Ohio

I, Laura Steerman, hereby swear, under penalty of perjury, that the following is true and correct to the best of my personal knowledge, information, and belief:

1. I am over 18 years of age and competent to make the following representations and give the following consent in this matter.

2. I was employed by Defendants Great Lakes Cheese Co., Inc. and Great Lakes Cheese of Ohio (collectively "Great Lakes Cheese") between approximately June, 2003 and December, 2006 as a line attendant.

3. I seek to recover unpaid wages from Defendants Great Lakes Cheese under the Fair Labor Standards Act and Ohio Minimum Wage Act, and consent to be the named Plaintiff in the above-captioned collective action. I agree to be bound by any adjudication of this action by the Court, and any collective action settlement approved by my attorneys and this Court as being fair, adequate and reasonable.

4. I consent to bring this action on behalf of myself and two classes of similarly-situated opt-in plaintiffs, as defined in the above-captioned Complaint as follows:

**The Rounding Class**

All former and current production employees of Defendants Great Lakes Cheese in Hiram, Ohio, who at any time between July 2, 2004 and present, were not paid for all hours worked due to Defendants' practice of rounding down start times to the nearest half of an hour.

**The Uniform Class**

All former and current production employees of Defendants Great Lakes Cheese in Hiram, Ohio, who at any time between July 2, 2004 and present, were not paid for changing into and out of uniforms, hair coverings, and/or personal protective equipment at work.

5. I observed that these classes of similarly-situated opt-in plaintiffs consist of no less than two hundred persons. At any given time during my employment, Defendants employed at least two hundred production employees.

6. I believe that I am similarly situated to the rounding class of opt-in plaintiffs because, during my employment at Great Lakes Cheese, I observed that the class and I:

- (a) were non-exempt, hourly, production employees; and
- (b) were not paid for all of the time we actually worked because our start times were rounded down to the nearest half of an hour.

7. I believe that I am similarly situated to the uniform class of opt-in plaintiffs because, during my employment at Great Lakes Cheese, I observed that the class and I:

- (a) were non-exempt, hourly, production employees; and
- (b) were not paid for time spent changing into and out of our uniforms, hair coverings, and personal protective equipment at work.

WHEREFORE, I hereby consent and agree to be a representative Plaintiff in the above-captioned collective action against Defendants Great Lakes Cheese, and to be represented by Cohen Rosenthal & Kramer LLP and The Lazzaro Law Firm, LLC.

FURTHER AFFIANT SAYETH NAUGHT.

Laura Steerman

Laura Steerman  
262 Washington Street  
Warren, OH 44483

SWORN TO BEFORE ME and subscribed in my presence in Trumbull County, Ohio, this 29th day of June, 2007.

AJL  
Notary Public



ANTHONY J. LAZZARO, Attorney  
Notary Public, State of Ohio  
My Commission Has No  
Expiration Date  
Section 147.03 R.C.

Respectfully submitted,

**COHEN ROSENTHAL & KRAMER LLP**

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